

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

DAVID P. DONOVAN,

Plaintiff,

v.

BETH A. WILKINSON,

Defendant.

Civil Action No. 1:20-cv-1344

**MOTION TO FILE BETH WILKINSON'S PRAECIPE
REGARDING EXHIBIT W6 TO HER DECLARATION UNDER SEAL**

Pursuant to Local Civil Rule 5(C), Defendant Beth Wilkinson, by undersigned counsel, hereby moves to file her Praecipe Regarding Exhibit W6 to Her Declaration under seal.

Defendant is filing this motion to seal because the praecipe relates to an exhibit that Judge Davis has previously agreed should remain under seal. Through the praecipe, Defendant is seeking only to inform the Court that the declaration contains an incorrect version of the exhibit.

Pursuant to Local Civil Rule 5(C), Defendant provides the following non-confidential description of the material that has been filed under seal: a praecipe stating that Ms. Wilkinson's declaration contains an incorrect document as an exhibit.

Dated: June 2, 2021

Respectfully submitted,

Beth Wilkinson

By: /s/ Thomas G. Connolly

Thomas G. Connolly (VA Bar No. 29164)

Thomas B. Mason (*pro hac vice*)

Jared Paul Marx (VA Bar No. 91213)

HARRIS, WILTSHIRE & GRANNIS, LLP

1919 M Street NW, 8th Floor

Telephone: (202) 730-1300

Fax: (202) 730-1301

tconnolly@hwglaw.com

tmason@hwglaw.com

jmarx@hwglaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused a true copy of the foregoing motion to be served by ECF on all parties.

Dated: June 2, 2021

/s/ Thomas G. Connolly
Thomas G. Connolly